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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

VERONICA MCLEOD, individually and as
successor in interest to decedent, DOLORES
HERNANDEZ; AMADO HERNANDEZ,
individually and as successor in interest to
decedent, DOLORES HERNANDEZ; and
YSIDRA REGALDO, individually,

Plaintiffs,

vs.

CITY OF REDDING; GARRETT MAXWELL,
an individual; MATTHEW BRUCE, an
individual; and DOES 2-10, inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

Honorable William B. Shubb
Hon. Magistrate Jeremy D. Peterson

DECLARATION OF HANG D. LE

DECLARATION OF HANG D. LE

I, Hang D. Le, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the Eastern District of California. I make this declaration in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment or in the Alternative Summary Adjudication. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant portions of the January 19, 2023 Deposition of Garret Maxwell.

3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant portions of the December 4, 2020 Statement of Garret Maxwell for Internal Affairs Investigation 20-0033.

4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the relevant portions of the April 27, 2023 Deposition of Matthew Bruce.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant portions of the December 4, 2020 Statement of Matthew Bruce to County of Shasta Sheriff's Office detectives.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of photographs taken of Matthew Bruce's injuries at the hospital after the incident.

7. Attached hereto as "**Exhibit 6**" is a true and correct copy of the relevant portions of the February 15, 2024 Deposition of Aiden Phillips.

8. Attached hereto as "**Exhibit 7**" is a true and correct copy of the relevant portions of the February 27, 2024 Deposition of Richard Bell.

9. Attached hereto as "**Exhibit 8**" is a true and correct copy of the relevant portions of the February 22, 2024 Deposition of Jennifer Hoberg.

10. Attached hereto as "**Exhibit 9**" is a true and correct copy of the Shasta County Sheriff Report of Autopsy of Dolores Hernandez.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct. Executed this 13th day of May 2024 in
3 Woodland Hills, California.

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6 A handwritten signature in blue ink, appearing to read 'Hang Le', is written over a horizontal line.

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